

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MELINDA SERIN, JUDSON RUSS, LONG SOU
LIM, PERI KETTLER, GORDON REDNER, AND
THOMAS J. SMITH,

Plaintiffs,

-against-

NORTHERN LEASING SYSTEMS, INC., JAY
COHEN, RICH HAHN, and SARA KRIEGER,

Defendants.
----- X

06 CV 1625 (SCR)

DEFENDANTS' PROPOSED
VOIR DIRE

Defendants' NORTHERN LEASING SYSTEMS, INC., JAY COHEN, RICH HAHN,
and SARA KRIEGER respectfully request that the following questions be posed to prospective
jurors during voir dire examination:

Inability to Serve:

1. Do you have any medical appointments or expected hospitalizations that would prevent you from serving as a juror in this case until November __, 2010?
2. Do you have any medical condition that prevents you from sitting for long periods of time or from concentrating on the evidence presented in this case?
3. Do you have any prepaid airline tickets to travel between now and November __ 2010?

Contact with Parties, Law Firms or Attorneys

1. Have you previously heard of a company called Northern Leasing Systems, Inc.? If so, please describe what you know or have heard about the company?
2. Have you ever done business with Northern Leasing Systems, Inc.? If so, please describe the nature of your business.

3. Do you know any of the plaintiffs, who are Melinda Serin, Long Soui Lim, Perri Kettler, Thomas Smith, Judson Russ or Gordon Redner?
4. Do you know any of the attorneys or law firms representing either the plaintiffs or defendants in this suit personally?

Personal Litigation Experience:

1. Have you ever filed a lawsuit? If so, what was the nature of the suit?
2. Have you ever been the defendant in a lawsuit? If so, what was the nature of the suit brought against you?
3. Do you have any immediate family members, or close colleagues or friends who have been or is a plaintiff or defendant in a lawsuit and what was the nature of those suits?
4. Have you ever been sued by a company seeking to recover from you under a contract? If so, please explain the nature of the suit and what happened in the suit.
5. Have you ever had a dispute with another person related to a written contract? What happened?

Employment Information:

1. What is your current employment status: full time employed, part time employed, out of work, or retired.
2. Do you work for a company or are you self employed?
3. Where are you currently employed?
4. Which of your employer's locations do you work at?
5. What kind of work do you do? What did you do at your most recent job?
6. Do you supervise anyone?
7. How many other employees report to you? How many other employees indirectly report to you?
8. Do you have a second job? If so, what is it?
9. Have you ever used a credit card swiping or check scanning machine?

Family Information:

1. What is your current marital status: never married, married, living with a significant other or partner, separated, divorced, widowed, or remarried.
2. If married, living with significant other or partner, separated, divorced, remarried or widowed: What is (or was) the specific nature of your spouse's, significant other's, or partner's work?
3. What kind of work do your children do?
4. Have you, your spouse, significant other, partner, close family member, close work colleague, or close friend ever been convicted of a felony? If so, what is your relationship to the person? What did the government claim? What happened in the case?

Relevant Personal Experience:

1. Have you ever leased a car or other vehicle?
2. Have you ever joined a gym with a membership commitment spanning a specified period of time?
3. Have you ever signed up for a service where you commit to pay for the service for a certain period of time?
4. Have you ever had any hassles over the terms or payments in connection with the lease(s) you entered into? Please describe.
5. Have you ever heard of a claim or complaint against defendant Northern Leasing Systems Inc.? If so, what have you heard?
6. Do you currently own, or have you ever owned, a small business?
7. Have you ever bought a credit card scanning or check processing machine, or had an equipment lease for your business? Please describe your experience in this area.
8. Have you ever been the victim of identity theft? If so, when and by whom? If so, what were the effects of identity theft on you and others?
9. Have you ever had any experience with a credit card sales organization? Please describe.
10. Have you had any experience with a lease financing company? Please describe.
11. Are you familiar with the term "Independent Sales Organization"?

12. Have you ever felt like you were taken advantage of in dealing with a company or corporation? If so, please explain.
13. Have you ever been in debt to a company under a contract or lease?
14. Have you ever been the personal guarantor on a lease or other contract? If so, please explain your reasons for doing so and the type of contract you guaranteed. Please explain the circumstances.
15. Have you ever signed a document on behalf of someone else?

Miscellaneous

1. Do you believe a company has the right to attempt to recover money it is owed under a contract by contacting the person via letter and telephone?
2. Do you believe that just because plaintiffs have brought this lawsuit and there is going to be a trial, that defendants must be in the wrong and plaintiffs should recover money? Please describe your feelings on this.
3. Do you believe that you can be fair to both sides?
4. Do you think that because one of the defendants is a corporation, and the other defendants work for the corporation, you could not give them equal consideration under the law, as you give to the plaintiffs, who are individuals?
5. Do you believe that you would be unable to give a verdict in favor of the defendants, if the evidence shows that defendants acted properly in enforcing rights against plaintiffs?